



California Regional Water Quality Control Board

Santa Ana Region



Winston H. Hickox
Secretary for
Environmental
Protection

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March 3, 2003

Mr. James Good
Gresham, Savage, Nolan & Tilden, LLP
6000 North Arrowhead Avenue, Suite 300
San Bernardino, Ca 92401-1148

CONDITIONAL APPROVAL OF WORK PLAN FOR INITIAL PERCHLORATE INVESTIGATION AT PYRO SPECTACULARS, INC. – 3196 NORTH LOCUST AVENUE, RIALTO, SAN BERNARDINO COUNTY

Dear Mr. Good:

We have reviewed the December 9, 2002 submittal entitled "Work Plan for Initial Perchlorate Investigation" for Pyro Spectaculars, Inc., 3196 North Locust Avenue, Rialto. The work plan was submitted by your environmental consultant (Kleinfelder), in compliance with the Investigation Order letters that I sent to Mr. James Souza (October 7, 2002) and you (November 6, 2002).

Members of the Inland Empire Perchlorate Regulatory Task Force provided comments on the work plan to us, and those technical comments were considered in preparing this response. Based on our review, I conditionally approve the proposed work plan, as modified by the comments described in this letter.

The Pyro Spectaculars facility occupies approximately 25 acres of leased land located in the north half of the southwest quarter of Section 21, Township 1 North, Range 5 West, of San Bernardino Baseline and Meridian. According to Kleinfelder, the company develops and produces pyrotechnics (fireworks) for public display. The company purchases all of their pyrotechnic shells and stage products from international and domestic vendors, and does not manufacture or modify pyrotechnical devices on-site. The facility consists of eleven on-site buildings and four buildings on the adjacent American Promotional Events Inc. – West lease (Figure 3 of the work plan). In addition, Pyro Spectaculars currently leases approximately five acres of property that is located roughly 0.5-mile south of the Pyro Spectaculars facility (Figure 2 of the work plan). Storage Bunker B-1 is located on this five-acre parcel. Pyro Spectaculars uses Storage Bunker B-1 for the storage of sealed pyrotechnic shells, and for packing the sealed shells into show boxes for custom fireworks display events.

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On February 6, 2003, Board staff met with Mr. Gary Brown of Pyro Spectaculars and inspected Storage Bunker B-1 and the adjacent land, where several metal, mobile bins are used for storage of bulk fireworks. The purpose of this inspection was to learn about the pyrotechnic storage and shipping operations, and to observe the physical condition of the storage bunker.

Your work plan proposes that, during this initial phase of perchlorate investigation, Kleinfelder will review additional historical records (consisting of aerial photographs, building permits, property ownership records and other documents). This review will focus on information related to past and current site activities, areas of waste disposal, and other areas where releases of perchlorate might have occurred. The on-site locations for these activities will be identified and correlated with the existing site features. In addition, facility operations, process flow, chemical use, and waste streams at the Pyro Spectaculars facility will be reviewed to develop additional understanding of the manufacturing processes that may have resulted in, or could result in, releases of chemicals to the soil and groundwater.

The proposed fieldwork at the Pyro Spectaculars, Inc. facility consists of three exploratory trench excavations and one soil boring to collect soil samples for analysis of perchlorate. A backhoe is proposed to be used to excavate trenches in the following locations:

- One trench between storage bunker M-11 and M-12, located on the northwest corner of the Pyro Spectaculars facility.
- One trench in the current mortar storage area, located on the southwest corner of the Pyro Spectaculars facility.
- One trench in the former mortar storage area, near the loading dock building, on the north-central portion of the Pyro Spectaculars facility.

Each trench is proposed to be excavated to a total depth of ten feet below ground surface (bgs). Soil samples are proposed to be collected at 1, 5, and 10 feet bgs. Each trench is proposed to be backfilled with the excavated soil, and the material compacted with the backhoe.

- One soil boring is proposed to be drilled to a depth of approximately 50 feet bgs. The soil boring is proposed to be drilled in the gravel area at the eastern entrance of the Bunker B-1 loading dock. The boring is proposed to be drilled using an air-rotary drilling rig with casing advance or similar drilling method. Soil samples are proposed to be collected at 10-foot intervals or in fine-grained horizons encountered during drilling, using a split-spoon sampler lined with brass sleeves.

Chemical analyses of soil collected during site investigations will be performed by a California-certified analytical laboratory, using USEPA Method 314.1.

I concur with the proposed trenching, borehole, sampling, and analytical activities. Note that the soil at this locality is known to be very coarse-grained, including small to medium-sized boulders, interbedded with finer-grained soils. During the trenching and excavation of the trenches and the placement of the borehole, samples of finer grained soils (such as silt, sand, or clay) must be collected and analyzed for the presence of perchlorate, using EPA Method 314.1, and volatile organic compounds, using EPA Method 8260.

In addition to the proposed trenches and borehole, we require that one additional area be investigated. Based on Board staff's knowledge of the historical use and waste disposal practices that occurred at the former "Burn Pit" that is now located at the Rialto Concrete Products facility (Rialto Concrete), we believe that soil sampling and analytical testing for the presence of perchlorate in the immediate vicinity and beneath the former structure is necessary. We request that arrangements be made with the owners of Rialto Concrete to access their property to locate the former "pit" and to perform soil sampling beneath this former concrete structure. At a minimum, four slanted soil borings should be performed from all four sides of this structure, to a maximum depth of 15 feet bgs. Samples of the fine-grained materials should be collected and analyzed, as described above.

A plan for the additional investigation at the former burn pit site must be submitted to me in writing by March 19, 2003, and will be subject to my approval. A time schedule for the investigation activities at Pyro Spectaculars, Bunker B-1, and the former burn pit, and for submittal of the final project report with the laboratory analytical results, must also be provided with the March 19 plan.

Please be aware that the need for additional site investigation of the soil and groundwater will be evaluated once your proposed initial investigation phase has been completed and Board staff have reviewed and evaluated the soil sampling results.

We request that all records and aerial photos that are made available to your consultant for review and evaluation also be made available to Board staff simultaneously, in advance of commencing your field investigation.

Please notify the following individuals at least 24 hours prior to all field work to allow for inspection and oversight as needed: Kamron Saremi, RWQCB (909) 782-4303; Wendy Arano, DTSC (714) 484-5480; and Peter Murphy, Kennedy/Jenks Consultants - Perchlorate Task Force (949) 261-1577.

If you have any questions, please contact Kamron Saremi at (909) 782-4303, or you may call Ann Sturdivant, Chief of our Spills, Leaks, Investigations and Cleanups Section, at (909) 782-4904.

Mr. James Good
Pyro Spectaculars

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March 3, 2003

Sincerely,

Gerard J. Thibeault
Executive Officer

cc:

Jorge Leon, SWRCB, Office of Chief Counsel
Inland Empire Perchlorate Regulatory Task Force (mailing list attached)
James Souza, Gary Brown – Pyro Spectaculars

Ks: Rialto perchlorate/13267/pyrowrkpla 03-03-03

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